

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Holt, et al. v. National Football League, et al.

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS FLOYD  
TURNER, JR. AND  
LORRI TURNER**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Floyd Turner, Jr. and Lorri Turner only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Floyd Turner, Jr. and Lorri Turner.
2. Plaintiff's counsel filed a short form complaint for Floyd Turner, Jr. and Lorri Turner on August 20, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Floyd Turner, Jr. and Lorri Turner and the undersigned.

4. Plaintiffs' counsel properly notified Floyd Turner, Jr. and Lorri Turner of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Floyd Turner, Jr. and Lorri Turner only in Court File No. 2:12-cv-4185-AB.

Dated: March 10, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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